## Case 1:21-cv-06807-ER Document 15 Filed 12/14/21 Page 1 of 1



21st Floor 1251 Avenue of the Americas New York, NY 10020-1104

Katherine Bolger (212) 402-4068 tel (212) 489-8340 fax

katebolger@dwt.com

December 14, 2021

The Honorable Edgardo Ramos Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007

Re: Jacob v. Lorenz, Case No. 1:21-cv-06807 (ER)

The application is <u>X</u> granted denied

Edgardo Ramos, U.S.D.J. Dated: December 14, 2021

New York, New York 10007

Dear Judge Ramos:

We represent Defendants Taylor Lorenz and The New York Times Company ("Defendants") in the above-referenced action. We write pursuant to your Individual Rule 1(E) to request a three-day extension in our time to move to dismiss Plaintiff's First Amended Complaint.

Plaintiffs filed their First Amended Complaint on November 19, 2021. (Dkt. No. 13). Per this Court's minute order of November 12, 2021, Defendants' response to the Complaint is due on December 20, 2021. Defendants now respectfully request a three-day extension of time to respond to the Complaint such that their response is due on December 23, 2021. This is Defendants' first request for an extension. The reason for the instant request is that undersigned counsel for Defendants is wrestling with a bout of the flu. Counsel for Plaintiffs has courteously consented to this request.

Thank you for your consideration.

Respectfully submitted,

Davis Wright Tremaine LLP

Katherine M. Bolger

Kather M. 181

cc: Counsel for Plaintiffs via ECF